

EXHIBIT N

**IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA**

DONALD J. TRUMP, in his capacity as a)	
Candidate for President, et al.,)	
)	
Petitioners,)	
)	
v.)	
)	Civil Action No. 2020CV343255
BRAD RAFFENSPERGER, in his official)	
capacity as Secretary of State of Georgia, et)	
al.,)	
)	
Respondents.)	
_____)	

AFFIDAVIT OF FRANCES WATSON

Before the undersigned officer duly authorized to administer oaths personally appeared Frances Watson, who, after being duly sworn, deposes and says:

1. My name is Frances Watson. I am over the age of 21 years, and I am under no legal disability that would prevent me from giving this affidavit. If called to testify, I would testify under oath to these facts.
2. I am the Chief Investigator in the Office of the Georgia Secretary of State. In this position, I conduct and supervise investigations of potential violations of state election law.
3. Investigators in the Secretary of State's office are certified by the Georgia Peace Officer Standards and Training Counsel, and they conduct investigations into the administration of elections and potential frauds and irregularities in elections in Georgia. Upon concluding an investigation into possible violations of Georgia election law, the findings of such investigations are reported to the State Election Board for further action.

4. Our office has investigated the allegations in paragraphs 105 to 111 of the Petition, which allege that two deceased voters voted in the November 3, 2020, general election. According to our records and, based upon further investigation, we determined that these allegations are false.

5. According to the voter file for Walter T. Holst, whose date of birth is 1/17/1930, his voter registration was cancelled on May 14, 2010, because he was deceased. The voter file also confirms that Mr. Walter T. Holst has not cast a ballot since 2009. A true and correct copy of Mr. Holst's voter file is attached as **Exhibit A**.

6. There is a second voter file for a Walter T. Holst, who is listed as female with a date of birth of 8/14/1933, and whose listed address is the same as the address in Mr. Holst's voter file. We confirmed that this individual is Mary Holst, the wife of Walter T. Holst, who is registered to vote as Mrs. Walter T. Holst. Mary Holst is the one who cast a ballot in the November 3, 2020, general election—not the deceased Walter Holst. A true and correct copy of Mrs. Holst's voter file is attached as **Exhibit B**.

7. Our office has an ongoing investigation into John Clent Rumph, who we determined had his identity stolen following his death. The voter file for Mr. Rumph indicates that he has not voted since the general and run-off elections in 2018, before his passing in 2019. His voter registration was cancelled on October 15, 2019. Our investigation has determined that someone used his identity at the Department of Drivers Services, which caused his voter status to change from "deceased" to "active." However, no ballot was cast in Mr. Rumph's name for the 2020 general election. A true and correct copy of Mr. Rumph's voter file, showing that he has not voted since 2018, is attached as **Exhibit C**.

8. Our office also has an ongoing investigation into the alleged incident at State Farm Arena described in paragraphs 186 to 191 in the Petition. On November 3, 2020, the Secretary of

State's office received complaints that staff of the Fulton County Board of Registrations and Elections directed clerks, public observers, and media personnel to leave the State Farm Arena location where ballots were being tabulated. The complaints alleged that Fulton County staff claimed that there was a water leak at the State Farm Arena, causing public observers and media to leave, but Fulton County staff continued to scan ballots in the tabulation center at the State Farm Arena without observers present.

9. Our investigation revealed that these allegations are not true and appear to be the result of a misunderstanding. The incident initially reported as a "water leak" late in the evening on November 3rd was actually a urinal that had overflowed early in the morning of November 3rd, and did not affect the counting of votes by Fulton County later that evening. We also determined that the alleged "water leak" was not used as a reason to tell observers and media to leave. Rather, the observers and media left on their own when they saw one group of workers leave because they had completed their assigned task of opening absentee ballot envelopes. Fulton County staff continued to scan ballots in the tabulation center at State Farm Arena.

10. Our office also reviewed the security video footage from the tabulation center at State Farm Arena from November 3 to 4, 2020. This video footage revealed that there were no mystery ballots that were brought in from an unknown location and hidden under a table. Video taken hours before shows the table being brought into the room at 8:22 a.m. Nothing was underneath the table then. Around 10 p.m., with the room full of people, including official monitors and the media, video shows absentee ballots that had already been removed from their security envelopes but not counted placed in the boxes, sealed up, and stored under the table. This was done because employees thought that they were done for the night and were closing up and ready

to leave. When the counting continued into later in the night, those boxes were opened so that the ballots inside could be counted. Our office continues to investigate this matter.

11. On December 11, 2020 I traveled to Coffee County, Georgia to meet with the Coffee County Elections Supervisor, Misty Martin, and to review the alleged issues Coffee County Board of Elections had in certifying the December 4, 2020 recount of votes cast in the November 3, 2020 presidential election.

12. Coffee County Board of Elections had previously confirmed the initial vote count and reconfirmed that initial count by conducting a hand count of the ballots on November 20, 2020.

13. Regarding the machine recount concluded on December 4, 2020, Coffee County Board of Elections allegedly had technical issues regarding the recount that led to a question of around 50 ballots.

14. Coffee County Board of Elections confirmed its recount results to the Secretary of State on December 7, 2020 and these matched the original election night count.

15. On December 11, 2020, I along with Investigations Area Supervisor Pam Jones, Investigator Josh Blanchard, Scott Tucker (Dominion), and Tom Feehan (Dominion), met to review the alleged technical issues Coffee County incurred. During that review the process of the recount were discussed. It was determined that after the Risk Limiting Audit the ballots were not stored in batches or separated into categories. This resulted in the ballots from Election Day, Early Advanced voting being mixed together. When the ballots were scanned during the recount and came out with 50 ballots over it was difficult to identify where to look for a discrepancy. During the investigation it was decided to batch the ballots in batches of 100. Upon the completion of batching the ballots, the Coffee County Attorney, Tony Rowell, called the totals out for each stack

as the Election Supervisor, Misty Martin totaled them. verifying the total matched the Election Night totals as a result of this review, the November 3, 2020 Coffee County election results were again validated.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 15th day of December, 2020.

Frances Watson

FRANCES WATSON

Sworn to and subscribed
before me this 15 day of
December, 2020.

Vincent Zagorin
NOTARY PUBLIC

